



Indiana Economic Development Corporation

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October 8, 2010

John Wood
Deputy General Counsel
Indiana Department of Child Services
302 W. Washington Street E306 - MS47
Indianapolis, IN 46204

Dear Mr. Wood:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document 10-415 and proposed by the Indiana Department of Child Services ("DCS"). The proposed rule amends 465 IAC 2-2, 2-9, 2-10, 2-11, 2-12, and 2-13 concerning the licensing of child placing agencies, child caring institutions, emergency shelter child caring institutions, private secure facilities, group homes, and emergency shelter group homes. The proposed rule also changes educational and experience qualifications for certain employees, amends child to caseworker ratios, establishes new ratios of supervisors to direct care staff, and adds definitions applicable to child placing agency licensing standards.

The economic impact statement prepared by the DCS estimates that there are approximately 100 residential services providers and 50 child placing agencies in the state that meet the definition of a "small business". Given the nature of the changes included in the proposed rule, the DCS states that small businesses will incur minimal to no new costs.

The IEDC does not object to the economic impact to small businesses associated with the proposed rule. DCS had indicated that any costs associated with the rule are expected to be minimal and that the proposed rule changes are needed to ensure children are being cared for by qualified competent staff. If you have any questions about the comments contained herein please contact me at 232-8962 or rasberry@iedc.in.gov.

Regards,

A handwritten signature in black ink, appearing to read "Ryan Asberry".

Ryan Asberry
Assistant Vice President